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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

BEST BUY STORES, L.P.,
Plaintiff,
v.
LF2 ROCK CREEK LP,
Defendant.

Case No. 2:13-CV-00433-MCE-AC

**STIPULATION AND ORDER TO EXTEND
FACT AND EXPERT DISCOVERY
DEADLINES IN PRETRIAL SCHEDULING
ORDER**

Complaint Filed: March 5, 2013
Trial Date: July 13, 2015

Plaintiff BEST BUY STORES, L.P., and Defendant LF2 ROCK CREEK LP (collectively, the “Parties”), by and through their respective undersigned counsel and subject to this Court’s approval, hereby stipulate and agree and request the approval of the Court to continue the fact and expert witness disclosure deadlines (currently set for February 1, 2015 and February 20, 2015, respectively) for an approximately one month as set forth below.

1. March 30, 2015: Fact discovery cut off for the limited purpose of taking the deposition of Best Buy’s Rule 30(b)(6) designee(s) pursuant to the deposition notice already served by Defendant.
2. April 15, 2015: Initial expert witness disclosures.

The Court is requested to approve these extensions on the following bases:

- 1) Having received the Court's Order on the Parties respective Motions for Summary Judgment that resolved at least one issue in the case, the Parties are schedule for mediation before Judge Kleinberg of JAMS on February 10, and wish to complete mediation before incurring additional expense related to fact and expert discovery and to postpone the depositions of 30(b)(6) witness and the expert disclosure deadline.
- 2) The requested extensions do not impact any other deadlines set forth in the Court's Pretrial Scheduling Order.
- 3) Four previous extensions have been requested by the Parties to the Court.
- 4) Trial is not set until July 13, 2015.

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1 IT IS HEREBY STIPULATED and the parties request that the following deadlines be extended
2 by approximately one month, with the new deadlines set forth below:

- 3 1. March 30, 2015: Fact discovery cut off for the limited purpose of taking the deposition of
4 Best Buy's Rule 30(b)(6) designee(s) pursuant to the deposition notice already served by
5 Defendant.
- 6 2. April 15, 2015: Initial expert witness disclosures.

8 DATED: January 30, 2015

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

9 By: /s/ Michael A. Geibelson (as authorized on 1/30/2015)
10 Michael A. Geibelson, Esq.

11 Attorneys for Plaintiff Best Buy Stores, L.P.

13 DATED: January 30, 2015

GREENBERG TRAURIG, LLP

14 By: /s/ Cindy Hamilton

15 William J. Goines
16 Cindy Hamilton
17 Alice Y. Chu

18 Attorneys for Defendant LF2 Rock Creek LP

19 **ORDER**

21 PURSUANT TO STIPULATION, **IT IS SO ORDERED.**

22 Dated: February 13, 2015

23 
24 MORRISON C. ENGLAND, JR., CHIEF JUDGE
25 UNITED STATES DISTRICT COURT